

To: Russ, Timothy[Russ.Tim@epa.gov]; Patulski, Meg[patulski.meg@epa.gov]; Dubey, Susmita[dubey.susmita@epa.gov]
Cc: Odendahl, Steve[Odendahl.Steve@epa.gov]; Denawa, Mai[Denawa.Mai@epa.gov]; Dresser, Chris[Dresser.Chris@epa.gov]; Anderson, Carol[Anderson.Carol@epa.gov]; Schuller, Jennifer[Schuller.Jennifer@epa.gov]; Jackson, Scott[Jackson.Scott@epa.gov]; Rickard, Joshua[Rickard.Joshua@epa.gov]
From: Berry, Laura
Sent: Fri 11/18/2016 4:45:53 PM
Subject: RE: Revised DRAFT Information for Transmittal to FHWA Regarding the I-70 East Project

Hi Tim,

Ex. 5 - Deliberative Process

Thanks,

Laura Berry

(734) 214-4858

berry.laura@epa.gov

From: Russ, Timothy
Sent: Friday, November 18, 2016 10:05 AM
To: Patulski, Meg <patulski.meg@epa.gov>; Berry, Laura <berry.laura@epa.gov>; Dubey, Susmita <dubey.susmita@epa.gov>
Cc: Odendahl, Steve <Odendahl.Steve@epa.gov>; Denawa, Mai <Denawa.Mai@epa.gov>; Dresser, Chris <Dresser.Chris@epa.gov>; Anderson, Carol <Anderson.Carol@epa.gov>; Schuller, Jennifer <Schuller.Jennifer@epa.gov>; Jackson, Scott <Jackson.Scott@epa.gov>; Rickard, Joshua <Rickard.Joshua@epa.gov>
Subject: FW: Revised DRAFT Information for Transmittal to FHWA Regarding the I-70 East

Project

Hi Everyone,

Ex. 5 - Deliberative Process

Thanks to all for your review and edits!

Tim

Tim Russ
Environmental Scientist
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La Casa (CASA)

Region: Denver

Monitoring Station

4545 Navajo Street

SAROAD:

AQS ID: 080310026

Latitude: 39.779460

Longitude: -105.005124

Reporting capabilities (hourly)

SLAMS: CO, PM10, PM2.5

NAMS: O3, SO2

SPM: NO, RD, RS, TEMP, WD, WS

EPA's November, 2015 PM Hot-spot modeling guidance ("Transportation Conformity Guidance for Quantitative Hot-spot Analyses in PM_{2.5} and PM₁₀ Nonattainment and Maintenance Areas") notes the following in section 9.3.4 *24-hour PM₁₀ NAAQS*:

Calculating Design Values and Determining Conformity

The 24-hour PM₁₀ design value is calculated at each receptor by directly adding the sixth-highest modeled 24-hour concentrations (if using five years of meteorological data) to the appropriate monitor value for the 24-hour background concentration from three years of monitoring data, based on Exhibit 9-6.¹⁵³ Exhibit 9-6: Monitor Value Used for Design Value Calculation

Number of Background Concentration Values from the Monitor	Monitor Value Used for Design Value Calculation
< 347	Highest Monitor Value
348 -695	Second Highest Value
696 -1042	Third Highest Value
1043 -1096	Fourth Highest Value

PM₁₀ data from the La Casa monitoring site are provided in the table below:

POC 1 1 in 3 Sampler

Year	N	Highest value	2 nd highest	3 rd highest	4 th highest
2015	119	55	48	44	43
2014	127	66	65	62	62
2013	122	81	73	56	45

“N” = the number of days of valid data recovery.

NOTE: There are actually three PM₁₀ monitors co-located at the La Casa monitoring location. POC#1 is a “1 in 3” sampler and takes a sample every 3rd day; it is our understanding that this is the primary monitor as so designated by CDPHE. POC#2 is a “1 in 6” sampler and takes a sample every 6th day and POC#3 is a continuous monitor and samples every day.

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We were aware before of a Sierra Club comment on the numbers and percentage of trucks on the I-70 East project. They had presented CDOT data that showed higher percentages of trucks than appeared to be used in the I-70 East FEIS. This issue, and using Sierra Club's comments, was also raised by two Denver City Councilmembers, in a letter to EPA dated 4/26/16, as follows:

"To estimate emissions from the highway segment nearest the neighborhoods where pollution levels are expected to be the worst, COOT omitted half of expected truck emissions by using the region wide truck share (4.9%) of VMT rather than the actual truck counts on I-70 (9.8%) reported on CDOT's website. Does the EPA rule require that emissions from actual traffic on the interstate be modeled?"

FHWA provided the below response:

"For the ROD modeling, FHWA ran MOVES2010b at the Project scale to develop lookup tables of PM₁₀ emissions rates for every possible combination of speed and grade. Separate tables of emissions rates were developed for "cars" and "trucks," as defined in the DRCOG model. To calculate total emissions for each link, these emissions rates (along with the APCD road dust emissions rates) are applied to the car

and truck volumes on each link. Thus, rather than using one project-wide “truck fraction,” truck emissions are explicitly calculated for each link using the reported truck volume for that link.”

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6.) Road Dust Emission Factors:

At the October 25, 2016 meeting, CDOT/FHWA advised they were considering updating the exhaust, brake and tire wear correction factor for the road dust emission factor used

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Please let us know if there are any questions.

Thanks!

Tim

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